

# HERITAGE IMPACT ASSESSMENT

(REQUIRED UNDER SECTION 38(8) OF THE NHRA (No. 25 OF 1999))

FOR THE PROPOSED MANGANESE SULPHATE (MNSO<sub>4</sub>) PLANT AT AFRICAN  
RAINBOW MINERALS: MACHADODORP WORKS (ARMMDW), MPUMALANGA

**Type of development:**

Industrial

**Client:**

Envirologistics (Pty) Ltd

**Applicant:**

African Rainbow Minerals: Machadodorp Works

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Project Reference:

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11 July 2023

## APPROVAL PAGE

<b>Project Name</b>	Proposed Manganese Sulphate (MnSO <sub>4</sub> ) Plant at African Rainbow Minerals: Machadodorp Works (ARMMDW), Mpumalanga
<b>Report Title</b>	Heritage Impact Assessment for the proposed Manganese Sulphate (MnSO <sub>4</sub> ) Plant at African Rainbow Minerals: Machadodorp Works (ARMMDW), Mpumalanga
<b>Authority Reference Number</b>	TBC
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<b>Applicant Name</b>	African Rainbow Minerals: Machadodorp Works

<b>Responsibility</b>	<b>Name</b>	<b>Qualifications and Certifications</b>	<b>Date</b>
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## DOCUMENT PROGRESS

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## Amendments on Document

Date	Report Reference Number	Description of Amendment

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## REPORT OUTLINE

Appendix 6 of the GNR 326 EIA Regulations published on 7 April 2017 provides the requirements for specialist reports undertaken as part of the environmental authorisation process. In line with this, Table 1 provides an overview of Appendix 6 together with information on how these requirements have been met.

**Table 1. Specialist Report Requirements.**

Requirement from Appendix 6 of GN 326 EIA Regulation 2017	Chapter
(a) Details of - (i) the specialist who prepared the report; and (ii) the expertise of that specialist to compile a specialist report including a curriculum vitae	Section a
(b) Declaration that the specialist is independent in a form as may be specified by the competent authority	<i>Declaration of Independence</i>
(c) Indication of the scope of, and the purpose for which, the report was prepared	Section 1
(cA) an indication of the quality and age of base data used for the specialist report	Section 3.4.
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 9
(d) Duration, Date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 3.4
(e) Description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 3
(f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of site plan identifying site alternatives;	Section 8 and 9
(g) Identification of any areas to be avoided, including buffers	Section 8 and 9
(h) Map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers	Section 8
(I) Description of any assumptions made and any uncertainties or gaps in knowledge	Section 3.7
(j) a description of the findings and potential implications of such findings on the impact of the proposed activity including identified alternatives on the environment or activities;	Section 1.3
(k) Mitigation measures for inclusion in the EMPr	Section 10.1 and 10.5
(l) Conditions for inclusion in the environmental authorisation	Section 10. 1 and 10.5
(m) Monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 10. 4.
(n) Reasoned opinion - (i) as to whether the proposed activity, activities or portions thereof should be authorised; (iA) regarding the acceptability of the proposed activity or activities; and (ii) if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Section 10.2
(o) Description of any consultation process that was undertaken during the course of preparing the specialist report	Section 5
(p) A summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Refer to BA report
(q) Any other information requested by the competent authority	No other information requested at this time

## Executive Summary

Envirologistics (Pty) Ltd has been appointed as the independent environmental assessment practitioner (EAP) to apply for environmental authorisation (EA) for the proposed Manganese Sulphate (MnSO<sub>4</sub>) Plant at African Rainbow Minerals: Machadodorp Works (ARMMDW), Mpumalanga. Beyond Heritage was appointed to conduct a Heritage Impact Assessment (HIA) for the project and the study area was assessed through a desktop assessment and by a non-intrusive pedestrian field survey. Key findings of the assessment include:


- The area in which the project is located is extensively disturbed through the current Manganese Slag Dump that will be reworked and is considered to be of low heritage potential;
- The lack of significant heritage resources in the project footprint was confirmed during the site visit and no heritage features were recorded;
- According to the SAHRA Paleontological sensitivity map the study area is of high paleontological significance and an independent study was commissioned for this aspect.

The impact on heritage resources is considered low and the project can be authorised provided that the recommendations in this report are adhered to and based on the South African Heritage Resource Authority (SAHRA) 's approval.

### Recommendations:

- Monitoring of the project area by the ECO during the construction phases for heritage chance finds, and if chance finds are encountered to implement the Chance Find Procedure for the project

**Declaration of Independence**

<b>Specialist Name</b>	Jaco van der Walt
<b>Declaration of Independence</b>	<p>I declare, as a specialist appointed in terms of the National Environmental Management Act (Act No 107 of 1998) and the associated 2014 Environmental Impact Assessment (EIA) Regulations (as amended), that I:</p> <ul style="list-style-type: none"> <li>• I act as an independent specialist in this application;</li> <li>• I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;</li> <li>• I declare that there are no circumstances that may compromise my objectivity in performing such work;</li> <li>• I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;</li> <li>• I will comply with the Act, Regulations and all other applicable legislation;</li> <li>• I have no, and will not engage in, conflicting interests in the undertaking of the activity;</li> <li>• I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;</li> <li>• All the particulars furnished by me in this form are true and correct; and</li> <li>• I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 49 A of the Act.</li> </ul>
<b>Signature</b>	
<b>Date</b>	04/07/2023

**a) Expertise of the specialist**

Jaco van der Walt has been practising as a Cultural Resource Management (CRM) archaeologist for 15 years. He obtained an MA degree in Archaeology from the University of the Witwatersrand focussing on the Iron Age in 2012 and is a PhD candidate at the University of Johannesburg focussing on Stone Age Archaeology with specific interest in the Middle Stone Age (MSA) and Later Stone Age (LSA). Jaco is an accredited member of the Association of South African Professional Archaeologists (ASAPA) (#159) and have conducted more than 500 impact assessments in Limpopo, Mpumalanga, North West, Free State, Gauteng, Kwa Zulu Natal (KZN) as well as the Northern and Eastern Cape Provinces in South Africa.

Jaco has worked on various international projects in Zimbabwe, Botswana, Mozambique, Lesotho, Democratic Republic of the Congo (DRC) Zambia, Guinea, Afghanistan, Nigeria and Tanzania. Through this, he has a sound understanding of the International Finance Corporations (IFC) Performance Standard requirements, with specific reference to Performance Standard 8 – Cultural Heritage

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**ABBREVIATIONS**

ASAPA: Association of South African Professional Archaeologists
BGG Burial Ground and Graves
CFPs: Chance Find Procedures
CMP: Conservation Management Plan
CRR: Comments and Response Report
CRM: Cultural Resource Management
DFFE: Department of Fisheries, Forestry and Environment,
EA: Environmental Authorisation
EAP: Environmental Assessment Practitioner
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EAP Environmental Assessment Practitioner
EMPr: Environmental Management Programme
ESA: Early Stone Age
ESIA: Environmental and Social Impact Assessment
GIS Geographical Information System
GPS: Global Positioning System
GRP Grave Relocation Plan
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)
MSA: Middle Stone Age
NEMA National Environmental Management Act, 1998 (Act No. 107 of 1998)
NHRA National Heritage Resources Act, 1999 (Act No. 25 of 1999)
NID Notification of Intent to Develop
NoK Next-of-Kin
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency

*\*Although EIA refers to both Environmental Impact Assessment and the Early Iron Age both are internationally accepted abbreviations and must be read and interpreted in the context it is used.*

**GLOSSARY**

Archaeological site (remains of human activity over 100 years old)

Early Stone Age (~ 2.6 million to 250 000 years ago)

Middle Stone Age (~ 250 000 to 40-25 000 years ago)

Later Stone Age (~ 40-25 000, to the historic period)

The Iron Age (~ AD 400 to 1840)

Historic (~ AD 1840 to 1950)

Historic building (over 60 years old)

## 1 Introduction and Terms of Reference:

Beyond Heritage was appointed to conduct a Heritage Impact Assessment (HIA) for the construction new Manganese Sulphate (MnSO<sub>4</sub>) Plant at the Machadodorp Work, approximately 7km south-west of the town of Emakhazeni (Machadodorp) located within the Mpumalanga Province (Figure 1.1 to 1.3). The town falls under the jurisdiction of the Emakhazeni Local Municipality, which forms part of the Nkangala District Municipality. The Works itself is located on portions 3, 4 and 9 (RE) of the Farm Schoongezicht 364JT, Portion RE of the Farm Delmanutha 376JT, and Portion 6 of the farm De Kroon 363JT, located within the jurisdiction of the Emakhazeni Local Municipality. The project in question is specifically location on Portion 4 of the farm Schoongezicht 364JT. The report forms part of the Basic Assessment (BA) and Environmental Management Programme (EMPr) for the development.

The aim of the study is to survey the proposed development footprint to identify cultural heritage sites, document, and assess their importance within local, provincial, and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources, and to submit appropriate recommendations with regard to the responsible cultural resources management measures that might be required to assist the developer in managing the discovered heritage resources in a responsible manner. It is also conducted to protect, preserve, and develop such resources within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999). The report outlines the approach and methodology utilized before and during the survey, which includes Phase 1, review of relevant literature; Phase 2, the physical surveying of the area on foot and by vehicle; Phase 3, reporting the outcome of the study.

During the survey, no heritage features were recorded. General site conditions and features on sites were recorded by means of photographs, GPS locations and site descriptions. Possible impacts were identified and mitigation measures are proposed in this report. The South African Heritage Resources Agency (SAHRA) as a commenting authority under section 38(8) of NHRA require all environmental documents, compiled in support of an Environmental Authorisation application as defined by NEMA EIA Regulations section 40 (1) and (2), to be submitted to SAHRA for commenting. Upon submission to SAHRA the project will be automatically given a case number as reference. As such the EIA report and its appendices must be submitted to the case as well as the EMPr, once it's completed by the Environmental Assessment Practitioner (EAP).

### 1.1 Terms of Reference

#### Field study

Conduct a field study to: (a) locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points of sites/areas identified as significant areas; c) determine the levels of significance of the various types of heritage resources affected by the proposed development.

#### Reporting

Report on the identification of anticipated and cumulative impacts the operational units of the proposed project activity may have on the identified heritage resources for all 3 phases of the project, i.e., construction, operation and decommissioning phases. Consider alternatives, should any significant sites be impacted adversely by the proposed project. Ensure that all studies and results comply with the relevant legislation, SAHRA minimum standards and the code of ethics and guidelines of ASAPA.

To assist the developer in managing the discovered heritage resources in a responsible manner, and to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999).

## 1.2 Project Description

Project components and the location of the proposed Project is outlined under Table 2 and 3.

**Table 2: Project Description**

<b>Farm and Magisterial District</b>	Machadodorp Works is situated approximately 7km south-west of the town of Emakhazeni (Machadodorp) located within the Mpumalanga Province. The town falls under the jurisdiction of the Emakhazeni Local Municipality, which forms part of the Nkangala District Municipality. The Works itself is located on portions 3, 4 and 9 (RE) of the Farm Schoongezicht 364JT, Portion RE of the Farm Delmanutha 376JT, and Portion 6 of the farm De Kroon 363JT, located within the jurisdiction of the Emakhazeni Local Municipality. The project in question is specifically location on Portion 4 of the farm Schoongezicht 364JT.
<b>Central co-ordinate of the development</b>	25°43'13.91"S and 30°13'5.87"E
<b>Topographic Map Number</b>	2530 CA

**Table 3: Infrastructure and project activities**

<b>Type of development</b>	Manganese Plant
<b>Size of development</b>	Approximately 3,3 hectares.
<p>The ARMMDW development team has identified the opportunity to construct a new Manganese Sulphate (MnSO<sub>4</sub>) Plant. This plant will rework the current Manganese Slag Dump. The current Manganese Slag Dump can provide a sustainable supply of product for eight (8) years, whereafter the Works will source other identified feed product for a further 12 years.</p> <p>The proposed plant will comprise of the following:</p> <ul style="list-style-type: none"> <li>• Milling</li> <li>• Filtration</li> <li>• Pugging</li> <li>• Dead Burn</li> <li>• Leaching</li> <li>• Post-leach Filtration</li> <li>• Precipitation, Thickening, and Filtration</li> <li>• Recycle</li> <li>• Crystallisation</li> <li>• Crystal Drying and Decomposition</li> <li>• Product Bagging</li> <li>• Post-crystallisation Gas Scrubbing</li> <li>• Use of reagents, chemicals, air abatement infrastructure and water.</li> </ul>	

## 1.3 Alternatives

No alternatives were provided for assessment. The area assessed does however allow for siting of the development to avoid impacts to heritage resources.

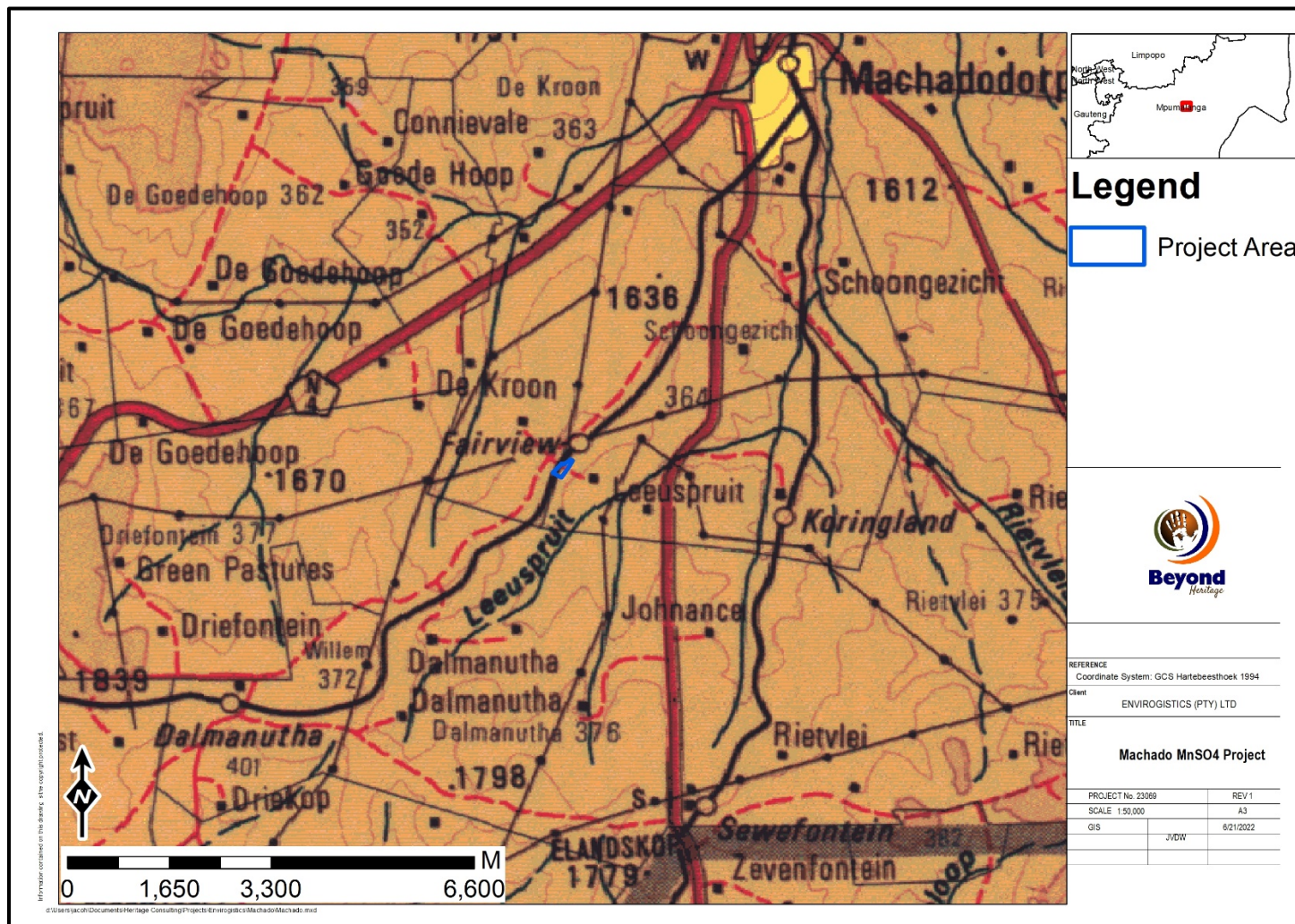


Figure 1.1. Regional setting of the Project (1: 250 000 topographical map).

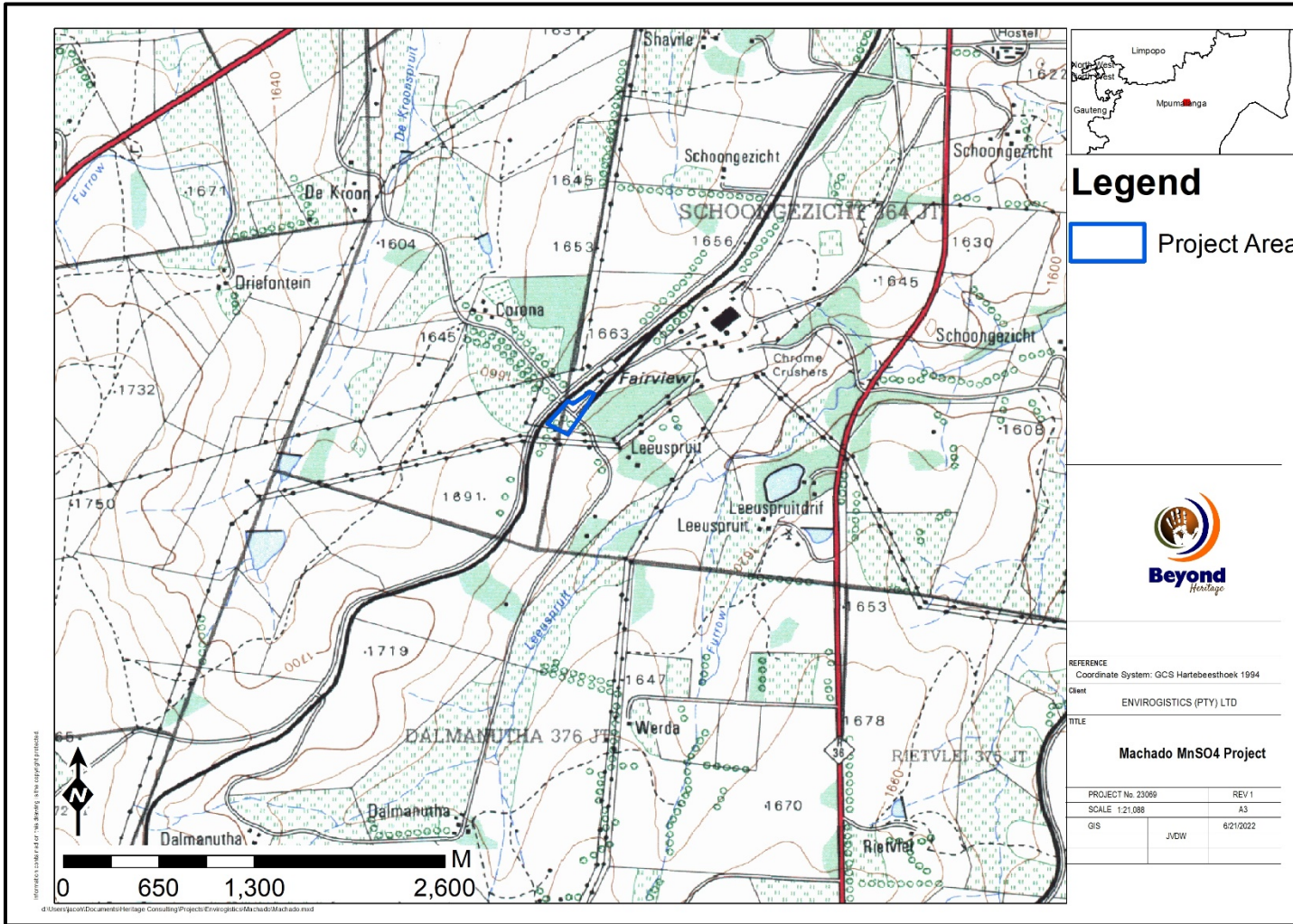


Figure 1.2. Local setting of the Project (1: 50 000 topographical map).

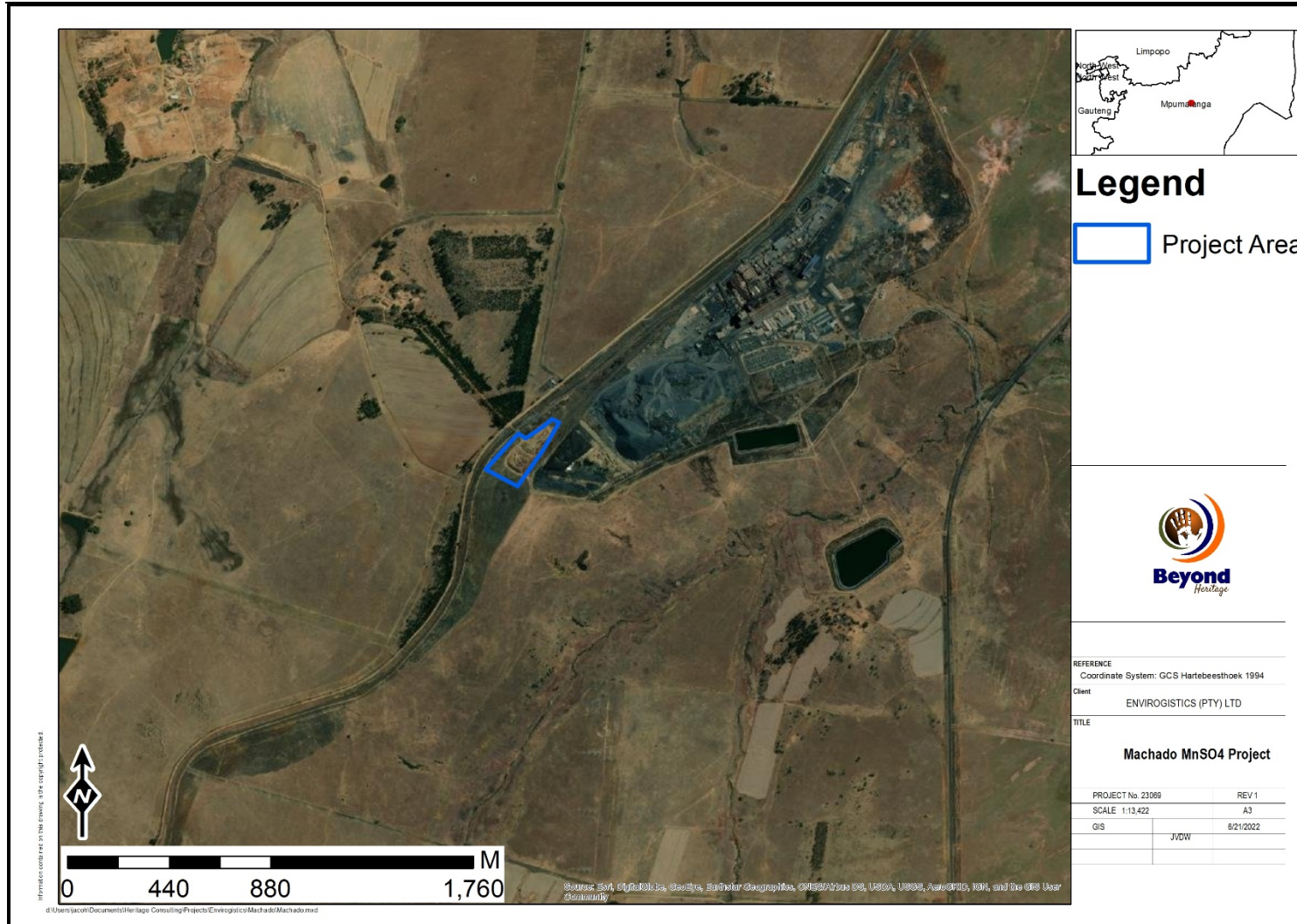


Figure 1.3. Aerial image of the Project area.



## 2 Legislative Requirements

The HIA, as a specialist sub-section of the EIA, is required under the following legislation:

- National Heritage Resources Act (NHRA), Act No. 25 of 1999)
- National Environmental Management Act (NEMA), Act No. 107 of 1998 - Section 23(2)(b)

A Phase 1 HIA is a pre-requisite for development in South Africa as prescribed by SAHRA and stipulated by legislation. The overall purpose of heritage specialist input is to:

- Identify any heritage resources, which may be affected;
- Assess the nature and degree of significance of such resources;
- Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;
- Assess the negative and positive impact of the development on these resources; and
- Make recommendations for the appropriate heritage management (or avoidance) of these impacts.

The HIA should be submitted, as part of the impact assessment report or EMPr, to the PHRA if established in the province or to SAHRA. SAHRA will ultimately be responsible for the evaluation of Phase 1 HIA reports upon which review comments will be issued. 'Best practice' requires Phase 1 HIA reports and additional development information, as per the impact assessment report and/or EMPr, to be submitted in duplicate to SAHRA after completion of the study. SAHRA accepts Phase 1 HIA reports authored by professional archaeologists, accredited with ASAPA or with a proven ability to do archaeological work.

Minimum accreditation requirements include an Honours degree in archaeology or related discipline and 3 years post-university CRM experience (field supervisor level). Minimum standards for reports, site documentation and descriptions are set by ASAPA in collaboration with SAHRA. ASAPA is based in South Africa, representing professional archaeology in the SADC region. ASAPA is primarily involved in the overseeing of ethical practice and standards regarding the archaeological profession. Membership is based on proposal and secondment by other professional members.

Phase 1 HIA's are primarily concerned with the location and identification of heritage sites situated within a proposed development area. Identified sites should be assessed according to their significance. Relevant conservation or Phase 2 mitigation recommendations should be made. Recommendations are subject to evaluation by SAHRA.

Conservation or Phase 2 mitigation recommendations, as approved by SAHRA, are to be used as guidelines in the developer's decision-making process.

Phase 2 archaeological projects are primarily based on salvage/mitigation excavations preceding development destruction or impact on a site. Phase 2 excavations can only be conducted with a permit, issued by SAHRA to the appointed archaeologist. Permit conditions are prescribed by SAHRA and includes (as minimum requirements) reporting back strategies to SAHRA and deposition of excavated material at an accredited repository.

In the event of a site conservation option being preferred by the developer, a site management plan, prepared by a professional archaeologist and approved by SAHRA, will suffice as minimum requirement.

After mitigation of a site, a destruction permit must be applied for with SAHRA by the applicant before development may proceed.

Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36 and GNR 548 as well as the SAHRA BGG Policy 2020. Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 of the National Heritage Resources Act (NHRA), as well as the National Health Act of 2003 and are the jurisdiction of SAHRA. The procedure for Consultation Regarding Burial Grounds and Graves (Section 36[5] of Act 25 of 1999) is applicable to graves older than 60 years that are situated outside a formal cemetery administrated by a local authority. Graves in this age category, located inside a formal cemetery administrated by a local authority, require the same authorisation as set out for graves younger than 60 years, in addition to SAHRA authorisation. If the grave is not situated inside a formal cemetery, but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws, set by the cemetery authority, must be adhered to.

Human remains that are less than 60 years old are protected under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance No. 7 of 1925) re-instituted by Proclamation 109 of 17 June 1994 and implemented by CoGHSTA as well as the National Health Act 2003 and are the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the office of the relevant Provincial Premier. Authorisation for exhumation and reinternment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. To handle and transport human remains, the institution conducting the relocation should be authorised under the National Health Act of 2003

### 3 METHODOLOGY

#### 3.1 Literature Review

A brief survey of available literature was conducted to extract data and information on the area in question to provide general heritage context into which the development would be set. This literature search included published material, unpublished commercial reports and online material, including reports sourced from the South African Heritage Resources Information System (SAHRIS).

#### 3.2 Genealogical Society and Google Earth Monuments

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where sites of heritage significance might be located; these locations were marked and visited during the fieldwork phase. The database of the Genealogical Society was consulted to collect data on any known graves in the area.

#### 3.3 Public Consultation and Stakeholder Engagement:

Stakeholder engagement is a key component of any BA process, it involves stakeholders interested in, or affected by the proposed development. Stakeholders are provided with an opportunity to raise issues of concern (for the purposes of this report only heritage related issues will be included). The aim of the public consultation process undertaken by the EAP was to capture and address any issues raised by community members and other stakeholders.

### 3.4 Site Investigation

The aim of the site visit was to:

- a) survey the proposed project area to understand the heritage character of the area and to record, photograph and describe sites of archaeological, historical or cultural interest;
- b) record GPS points of sites/areas identified as significant areas;
- c) determine the levels of significance of the various types of heritage resources recorded in the project area.

**Table 4: Site Investigation Details**

	Site Investigation
Date	18 May 2023
Season	Winter – The time of year did not influence the fieldwork. Heritage visibility was low due to the current Manganese Slag Dump. The Project footprint was sufficiently covered to understand the heritage character of the area (Figure 3.1).

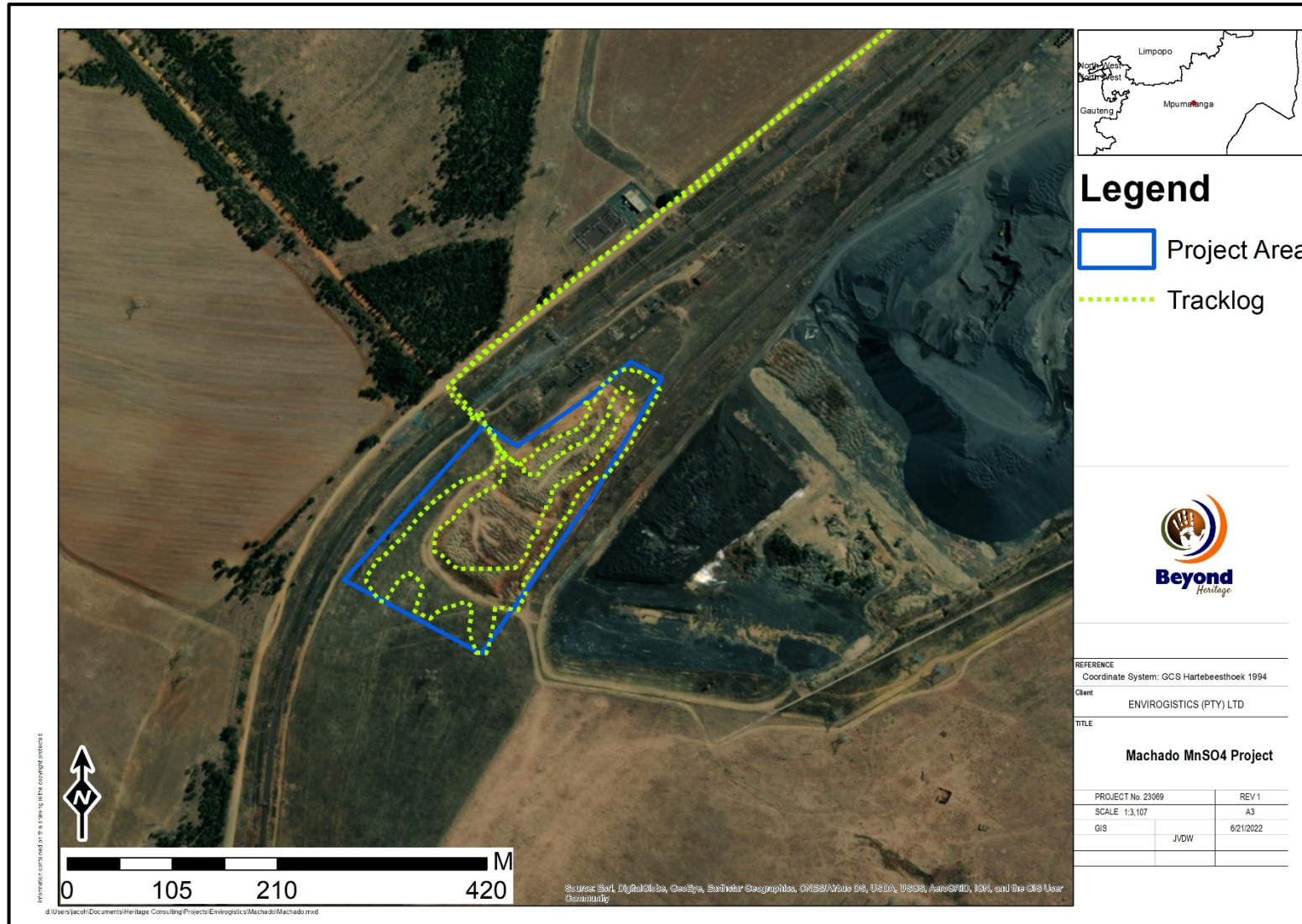


Figure 3.1. Tracklog of the survey path in yellow.

### 3.5 Site Significance and Field Rating

Section 3 of the NHRA distinguishes nine criteria for places and objects to qualify as 'part of the national estate' if they have cultural significance or other special value. These criteria are:

- Its importance in/to the community, or pattern of South Africa's history;
- Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa;
- Sites of significance relating to the history of slavery in South Africa.

The presence and distribution of heritage resources define a 'heritage landscape'. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In the case of the proposed project the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development were surveyed. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface. This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites. The following criteria were used to establish site significance with cognisance of Section 3 of the NHRA:

- The unique nature of a site;
- The integrity of the archaeological/cultural heritage deposits;
- The wider historic, archaeological and geographic context of the site;
- The location of the site in relation to other similar sites or features;
- The depth of the archaeological deposit (when it can be determined/is known);
- The preservation condition of the sites; and
- Potential to answer present research questions.

In addition to this criteria field ratings prescribed by SAHRA (2007), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report. The recommendations for each site should be read in conjunction with section 10 of this report.

**Table 5: Heritage significance and field ratings**

<b><i>FIELD RATING</i></b>	<b><i>GRADE</i></b>	<b><i>SIGNIFICANCE</i></b>	<b><i>RECOMMENDED MITIGATION</i></b>
National Significance (NS)	Grade 1	-	Conservation; national site nomination
Provincial Significance (PS)	Grade 2	-	Conservation; provincial site nomination
Local Significance (LS)	Grade 3A	High significance	Conservation; mitigation not advised
Local Significance (LS)	Grade 3B	High significance	Mitigation (part of site should be retained)
Generally Protected A (GP. A)	-	High/medium significance	Mitigation before destruction
Generally Protected B (GP. B)	-	Medium significance	Recording before destruction
Generally Protected C (GP.C)	-	Low significance	Destruction

### 3.6 Impact Assessment Methodology

The criteria below are used to establish the impact rating on sites:

- The **nature**, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional, and a value between 1 and 5 will be assigned as appropriate (with 1 being low and 5 being high):
- The **duration**, wherein it will be indicated whether:
  - \* the lifetime of the impact will be of a very short duration (0-1 years), assigned a score of 1;
  - \* the lifetime of the impact will be of a short duration (2-5 years), assigned a score of 2;
  - \* medium-term (5-15 years), assigned a score of 3;
  - \* long term (> 15 years), assigned a score of 4; or
  - \* permanent, assigned a score of 5;
- The **magnitude**, quantified on a scale from 0-10 where; 0 is small and will have no effect on the environment, 2 is minor and will not result in an impact on processes, 4 is low and will cause a slight impact on processes, 6 is moderate and will result in processes continuing but in a modified way, 8 is high (processes are altered to the extent that they temporarily cease), and 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
- The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale of 1-5 where; 1 is very improbable (probably will not happen), 2 is improbable (some possibility, but low likelihood), 3 is probable (distinct possibility), 4 is highly probable (most likely) and 5 is definite (impact will occur regardless of any prevention measures).
- The **significance**, which shall be determined through a synthesis of the characteristics described above and can be assessed as low, medium or high; and
- the **status**, which will be described as either positive, negative or neutral.
- the degree to which the impact can be reversed.
- the degree to which the impact may cause irreplaceable loss of resources.
- the *degree* to which the impact can be mitigated.

The **significance** is calculated by combining the criteria in the following formula:

$$S=(E+D+M) P$$

S = Significance weighting

E = Extent

D = Duration

M = Magnitude

P = Probability

The **significance weightings** for each potential impact are as follows:

- < 30 points: Low (i.e., where this impact would not have a direct influence on the decision to develop in the area),
- 30-60 points: Medium (i.e., where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- 60 points: High (i.e., where the impact must have an influence on the decision process to develop in the area).

### 3.7 Limitations and Constraints of the study

The authors acknowledge that the brief literature review is not exhaustive on the literature of the area. Due to the nature of heritage resources and pedestrian surveys, the possibility exists that some features or artefacts may not have been discovered/recorded and the possible occurrence of graves and other cultural material cannot be excluded. This limitation is successfully mitigated with the implementation of a Chance Find Procedure and monitoring of the study area by the Environmental Control Officer (ECO). This report only deals with the footprint area of the proposed development and consisted of non-intrusive surface surveys. This study did not assess the impact on medicinal plants and intangible heritage as it is assumed that these components will be highlighted through the public consultation process if relevant. It is possible that new information could come to light in future, which might change the results of this Impact Assessment.

## 4 Description of Socio-Economic Environment

According to Census 2011, of the 47 216 people in the Emakhazeni Local municipality, 87,2% are black African, 10,8% are white, with the other population groups making up the remaining 2%. Of those aged 20 years and older, 28,7% have completed matric, 7,4% have some form of higher education, and 15% have no schooling. One in four (25,9%) of the 18 454 economically active (employed or unemployed but looking for work) people in the municipality are unemployed. Among the 9 694 economically active youth (15–35 years) in the area, 34,2% are unemployed (statssa.gov.za).

## 5 Results of Public Consultation and Stakeholder Engagement:

### 5.1.1 Stakeholder Identification

Adjacent landowners and the public at large were informed of the proposed activity as part of the BA process by the EAP. Site notices and advertisements notifying interested and affected parties were placed at strategic points and in local newspapers as part of the process. No heritage concerns have been raised thus far.



## 6 Contextualising the study area:

### 6.1 Literature Review (SAHRIS)

Mpumalanga has a rich cultural layering and surveys in the surrounding areas found old water furrows, multiple Iron Age sites, historic ruins, rock engravings, and cemeteries. Surveys on smaller pieces of land found no heritage resources. The following Cultural Resource Management (CRM) assessments (Table 6) were conducted in the area and consulted for this report:

**Table 6. CRM reports consulted for the study.**

Author	Year	Project	Findings
Küsel, U.	2011a	Cultural Heritage Resources Impact Assessment of the proposed new power lines for Nkomati Machadodorp, Mpumalanga Province.	Old water furrow, historic kraal and house ruins, rock engravings, five LIA sites
Küsel, U.	2011b	Cultural Heritage Resources Impact Assessment of 2 x 132 kV Power Lines from Praire B substation to Witkloof and 2 x 132 kV Power lines from Praire B substation to Machadodorp Mpumalanga Province	LIA site, two cemeteries
Küsel, U.	2013	Basic Assessment of Three Alternative Power Lines Routes for the Construction of a New 132kV Kingbird Line from Gumeni MTS to Bosloop S/S a Distance Approximately of 26 Kilometre in Mpumalanga Province.	Old farm water furrow, stone build farm ruin, Iron sites.
Van Wyk Rowe, C.	2012	Phase 1 Archaeological/ Heritage Impact Assessment for Proposed Boarding School: Remainder of Portion 8 of the Farm Rietfontein 365 JT, Machadodorp, Mpumalanga Province.	Stone-walled enclosure
Celliers, J.	2013	Phase 1 Archaeological Survey on the Remainder of Portion 23 of the farm Schoongezicht 364 JT, Emthonjeni Township, Emakhazeni Municipality, Machadodorp.	No Sites
Celliers, J.	2016	Phase 1 Archaeological Impact Assessment on a Portion of the Remaining Extent of Portion 8 of the farm De Kroon 363-JT (to be known as Portion 20 of the farm De Kroon 363-JT) in respect of the proposed Milly's South Development/ Township near Machadodorp, Mpumalanga Province.	No Sites
Tomose, N.	2012	Heritage impact assessment study for the proposed Machadodorp PV solar facility on portion 8 of the farm De Kroon Machadodorp 368 JT, Emakhazeni Local Municipality, Mpumalanga Province, South Africa	No Sites

### 6.1.1 Google Earth and The Genealogical Society of South Africa (Graves and burial sites)

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where archaeological and historical sites might be located. The database of the Genealogical Society of South Africa indicated no known grave sites within the study area.

## 6.2 Archaeological Background

The archaeology of the area can be divided in three main periods namely the Stone Age, Iron Age and Historical period.

### 6.2.1 Stone Age

South Africa has a long and complex Stone Age sequence of more than 2 million years. The broad sequence includes the Later Stone Age, the Middle Stone Age and the Earlier Stone Age. Each of these phases contains sub-phases or industrial complexes, and within these we can expect regional variation regarding characteristics and time ranges. For (CRM) purposes it is often only expected/ possible to identify the presence of the three main phases. Yet sometimes the recognition of cultural groups, affinities or trends in technology and/or subsistence practices, as represented by the sub-phases or industrial complexes, is achievable. The three main phases can be divided as follows;

- » Later Stone Age (LSA); associated with Khoi and San societies and their immediate predecessors. - Recently to ~30 thousand years ago.
- » Middle Stone Age (MSA); associated with Homo sapiens and archaic modern human - . 30-300 thousand years ago.
- » Earlier Stone Age (ESA); associated with early Homo groups such as Homo habilis and Homo erectus. - 400 000-> 2 million years ago.

There are no extensive records for ESA and MSA sites and associated materials for the greater region and Stone Age research in the province is limited. Only a handful of these sites are on record within Mpumalanga but none are near the study area. An ESA site has been recorded in Maleoskop whereby deposits of Oldowan choppers and Acheulean hand axes and cleavers were found approximately 85km northeast of the project area (Esterhuysen and Smith 2007). The nearest MSA site of significance is Bushman's Rock Shelter situated in the Ohrigstad district (Wadley 1987). The cave was excavated twice in 1960s by Louw and then later by Eloff. The MSA layers show that the cave was repeatedly occupied over a long period of time. Lower layers of the deposit have been dated to over 40 000 years before present, with top layers dating to around 27 000 before present (Esterhuysen and Smith 2007).

Stone Age occupation in the region and Mpumalanga as a whole saw more widespread LSA occupation with various rock shelters where associated LSA material has been recorded in areas including Witbank, Ermelo, Barberton, Nelspruit, White River, Lydenburg and Ohrigstad (Bornman 1995). Within the Carolina District, two LSA rock shelters with four rock art panels were excavated and recorded (Esterhuysen and Smith 2007). The site was dated to have been occupied between 4870 years before present and as recently as 200 years before present. Both sites had LSA hunter-gatherer associated stone walling which is speculated to have served as protection against predators and intruders. Clay ceramic sherds and iron beads found at the site indicates early social interaction between the San communities and first farmers which entered the landscape around AD 500. LSA associated rock art in Mpumalanga has been associated with two groups, the San and the Khoekhoe who both occupied the landscape during this period.

### 6.2.2 Iron Age

Bantu-speaking people moved into Eastern and Southern Africa about 2,000 years ago (Mitchell 2002). These people cultivated sorghum and millets, herded cattle and small stock and manufactured iron tools and copper ornaments. Because metalworking represents a new technology, archaeologists call this period the Iron Age. Characteristic ceramic styles help archaeologists to separate the sites into different groups and time periods. The Iron Age as a whole represents the spread of Bantu speaking people and includes both the Pre-Historic and Historic periods. It can be divided into three distinct periods:

- » The Early Iron Age (EIA): Most of the first millennium AD.
- » The Middle Iron Age (MIA): 10th to 13th centuries AD.
- » The Late Iron Age (LSA): 14th century to colonial period.

Early Iron Age sites in the immediate landscape are not as common as Late Iron Age sites. EIA sites further north near Lydenburg have been documented and dated to around AD 720. Lydenburg is also home to the famous ceramic 'Lydenburg Heads' which were discovered in the 1960s. The occupation periods associated with the pottery dates to AD 600 and a second period of occupation from AD 800 to AD 1000 (Esterhuysen and Smith 2007).

The Mpumalanga escarpment is well known for its abundance of Iron Age stone wall complexes scattered across the province. The LIA occupation of the region spans from around AD 1500 until the 1800s as well as into Historic period. The Iron Age communities who settled in the escarpment include the BaKoni, Swazi, Ndebele and Pedi, with the Machadodorp region being largely occupied by the BaKoni. These groups settled around Machadodorp, Lydenburg, Badfontein, Sekhukuneland, Roossenekal, and Steelpoort. The BaKoni's origins can be traced back to the Nguni expansion out of Kwa-Zulu Natal into the interior of South Africa. Groups who retained the Nguni language are referred to as Ndebele and those who adopted the Sotho-Tswana language were then called the Bakoni, the Sotho-Tswana word for 'Nguni'. A defining feature and ideology that these groups are known for is their implementation of the Central Cattle Pattern (CCP) settlement pattern (Huffman 2007, Maggs 2007). According to Huffman (2001; 2007), the central kraal served as the settlement's court where important meetings were held, decisions were made, and any issues were resolved. This central area was associated with men of the community, with important men and chiefs being buried within the central kraal. The outside areas were where the women would reside as well as be buried. This settlement model was based on Kuper's ethnographic research on the Nguni and Sotho-Tswana worldview and settlements (Huffman 2001). Maggs (2007), argues that the ceramic facies which is attributed with the period and those who occupied the region is that of the Moloko Branch.

Iron Age rock art is also commonly found in Mpumalanga, with finger paintings commonly being associated with the Sotho-Tswana engravings, especially those depicting settlement layouts have been associated with Nguni communities (Maggs 2007).

The Difaqane (Sotho), or Mfekane ("the crushing" in Nguni) was a time of bloody upheavals in Natal and on the Highveld, which occurred around the early 1820's until the late 1830's (Bergh 1999: 10). It came about in response to heightened competition for land and trade, and caused population groups like gun-carrying Griquas and Shaka's Zulus to attack other tribes (Bergh 1999: 14; 116-119). It seems that, in 1827, Mzilikazi's Ndebele started moving through the area where Johannesburg is located today. This group went on raids to various other areas in order to expand their area of influence (Bergh 1999: 11).

### 6.2.3. Historical Period

The town of Machadodorp was founded in 1895 on the farm Geluk and was named after Major Joachim Jose Machado who had surveyed the region as part of the Pretoria- Delagoa Bay (present day Maputo) railway line project (Raper 2004). There was originally uncertainty as to whether or not Machadodorp should be proclaimed as town or not due to border disagreements between Lydenburg and Carolina. When Carolina was proclaimed a magisterial district in 1893, it was still uncertain whether Machadodorp would become part of Carolina or Lydenburg with the people of Machadodorp considering themselves more so to

be part of the Lydenburg district. When Belfast was proclaimed a magisterial district, the areas west and southwest of Machadodorp became part of the Belfast district. The Colonial Government once again addressed the issue pertaining to Machadodorp's status and in December of 1904, Machadodorp was then proclaimed as a municipal town.

#### **6.2.4. Anglo-Boer War**

Lord Roberts arrived in South Africa on the 10<sup>th</sup> of January 1900 to replace Commander Buller as the new commander of the British forces. Lord Roberts, moving away from Buller's from of frontal attack strategy, employed an attack of encircling the Boer troops. With the British taking control of Johannesburg by the end of May and fast approaching Pretoria, President Kruger along with the Boers and the Transvaal government fled to Machadodorp (Pretorius 2000). By June 5<sup>th</sup> 1900, the British had conquered the Boer capital of Pretoria. With the aim of claiming larger areas under Boer control along the Delagoa Bay railway line, General Buller, under the command of Commander Roberts, entered the area near Belfast. The Battle of Bergendal, also referred to as the Battle of Belfast and the Battle of Dalmanutha lasted from the 21<sup>st</sup> till the 27<sup>th</sup> of August 1900 ([www.sahistory.org.za](http://www.sahistory.org.za)). The battle took place on the farm Bergendal with the General Botha leading the Boer troops of 5000 men but they were outnumbered by the 20 000 men of the British troops led by General Buller. At this time, the *Zuid Afrikaansche Republiek Politie* (ZARPs) were positioning in Bergendal and twelve of them were killed by the British troops. The battle ended on the 27<sup>th</sup> of August when the Boers retreated further east as they were outnumbered. On the 28<sup>th</sup> of August, President Kruger travelled through Delagoa Bay to find refuge in Europe in an attempt to secure peace for the Republics (Pretorius 2000). On the same day, General Buller and the British troops marched to Machadodorp and by September 1<sup>st</sup> Lord Roberts had taken claim to the entirety of the Eastern Transvaal south of the Delagoa Bay railway line. The period hereafter is marked by guerrilla warfare which was implemented right up until the signing of the peace treaty in 1902 in Vereeniging.

In 1935 a memorial was unveiled in Belfast to honour the Boer lives lost at the Battle of Bergendal and another with a second memorial being unveiled in 1970 to honour all the Boer lives lost during the Anglo-Boer war in the Eastern Transvaal.

In the Machadodorp area, the house of Paul Kruger, known as Krugerhof used during the Anglo-Boer War was proclaimed as an historic monument in 1962.

## **7 Description of the Physical Environment**

The vegetation and landscape are described by Mucina and Rutherford (2006) as Steenkamsberg Montane Grassland. The landscape is mountainous with plateau grasslands, mountain slopes and shallow valleys. Grasslands are short with high forb diversity. The highest point in Mpumalanga (2330 m) occurs just north of the Steenkampsberg Pass. The project area has been altered by the current Manganese Slag Dump and local farming activities. General site conditions are illustrated in Figures 7.1 to 7.4.



Figure 7.1. General view of the open portions of veld on the western side of the current Manganese Slag Dump.



Figure 7.2. General site conditions in the study area illustrating the grass cover in the area.



Figure 7.3. General view of the top section of the current Manganese Slag Dump.



Figure 7.4. West facing section of the current Manganese Slag Dump.

## 8 Findings of the Survey

### 8.1 Heritage Resources

Most of the study area have been altered by the current Manganese Slag Dump that would have destroyed surface indicators of heritage resources if any ever occurred in this area and the development footprint is considered to be of low heritage potential. This was confirmed during the survey and no heritage finds were recorded.

### 8.2 Cultural Landscape

The study area is in a rural setting characterised by cultivation and agricultural activities with a historical layering consisting of limited infrastructure like fences, a powerline, a railway line and structures (Figure 8.6 to 8.7). None of these are in the current project footprint.

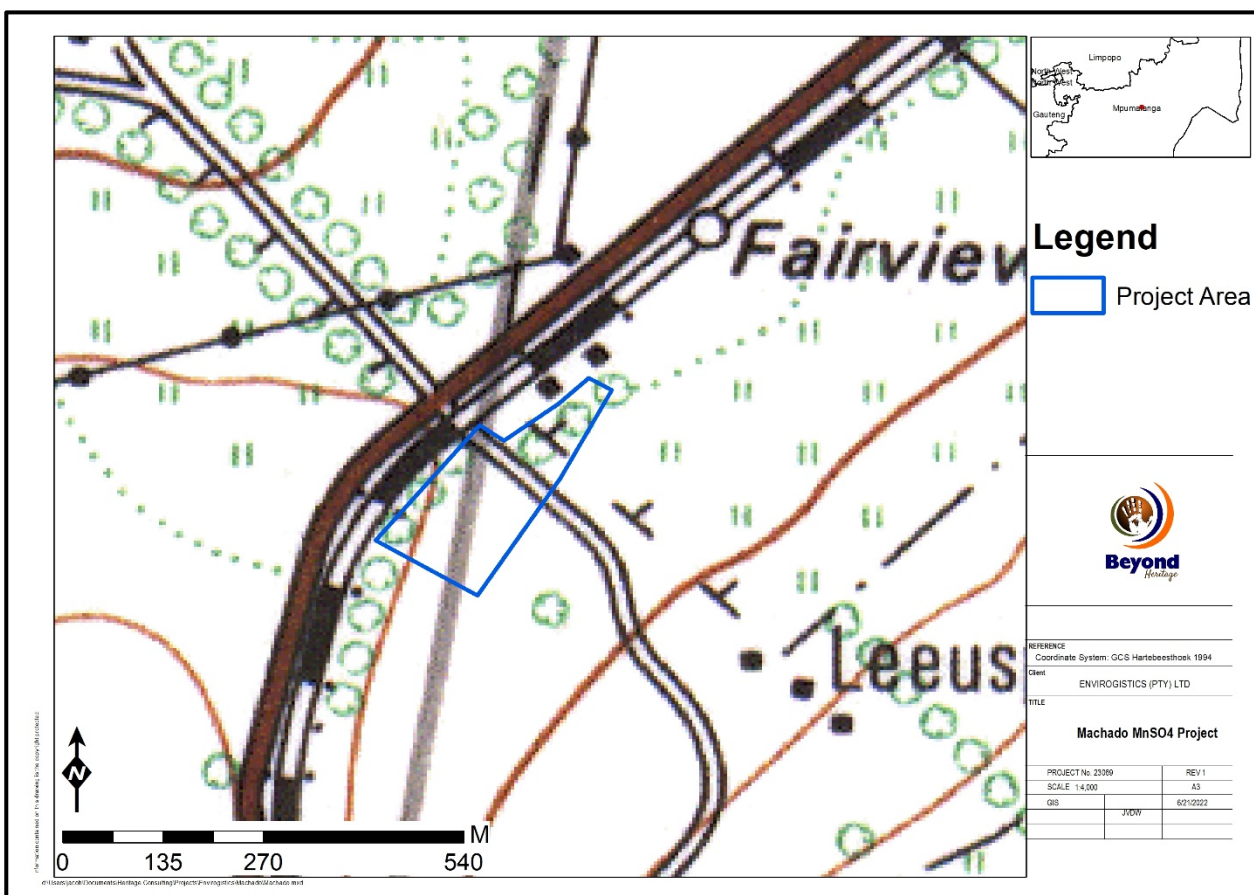


Figure 8.1. 1969 Topographic map of the area showing no developments in the study area. A railway line is visible outside of the study area as well as a powerline.

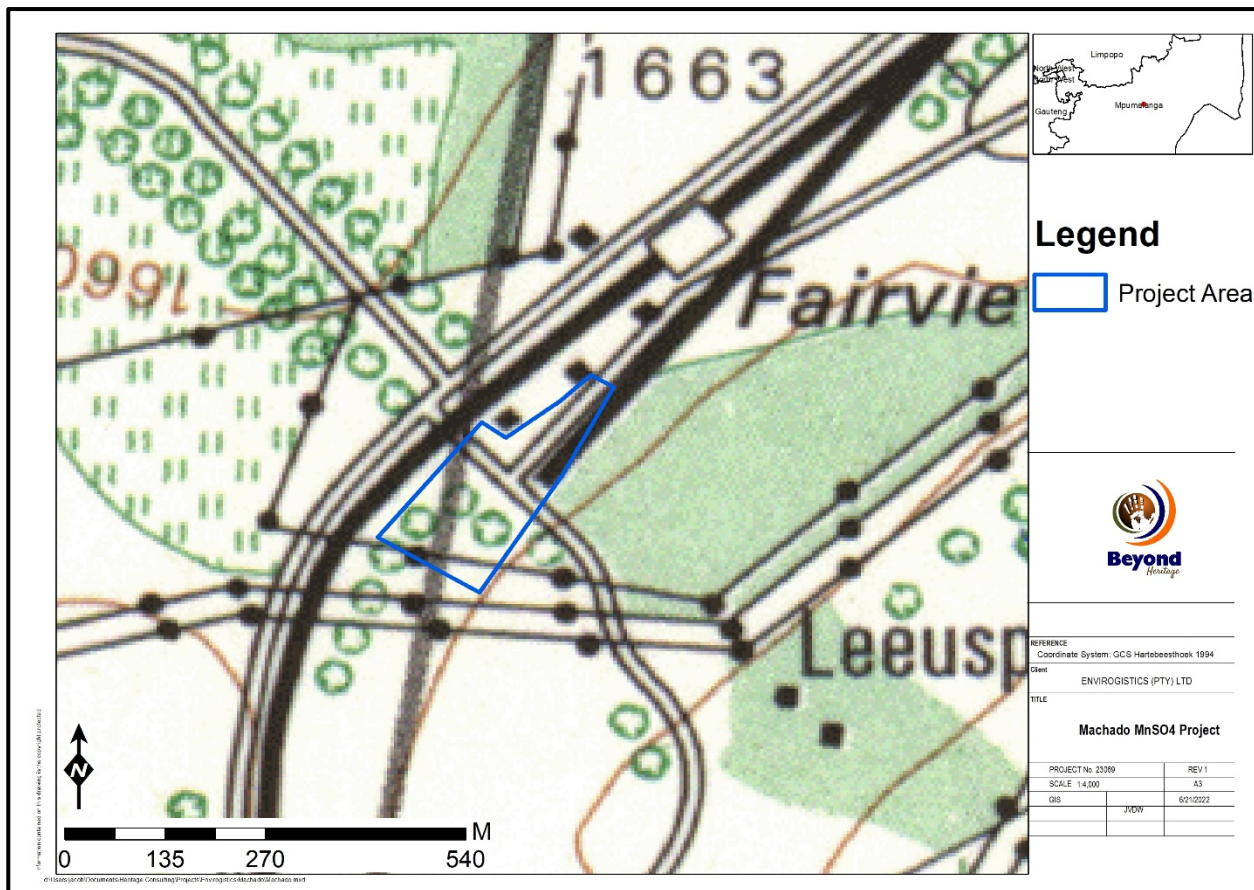
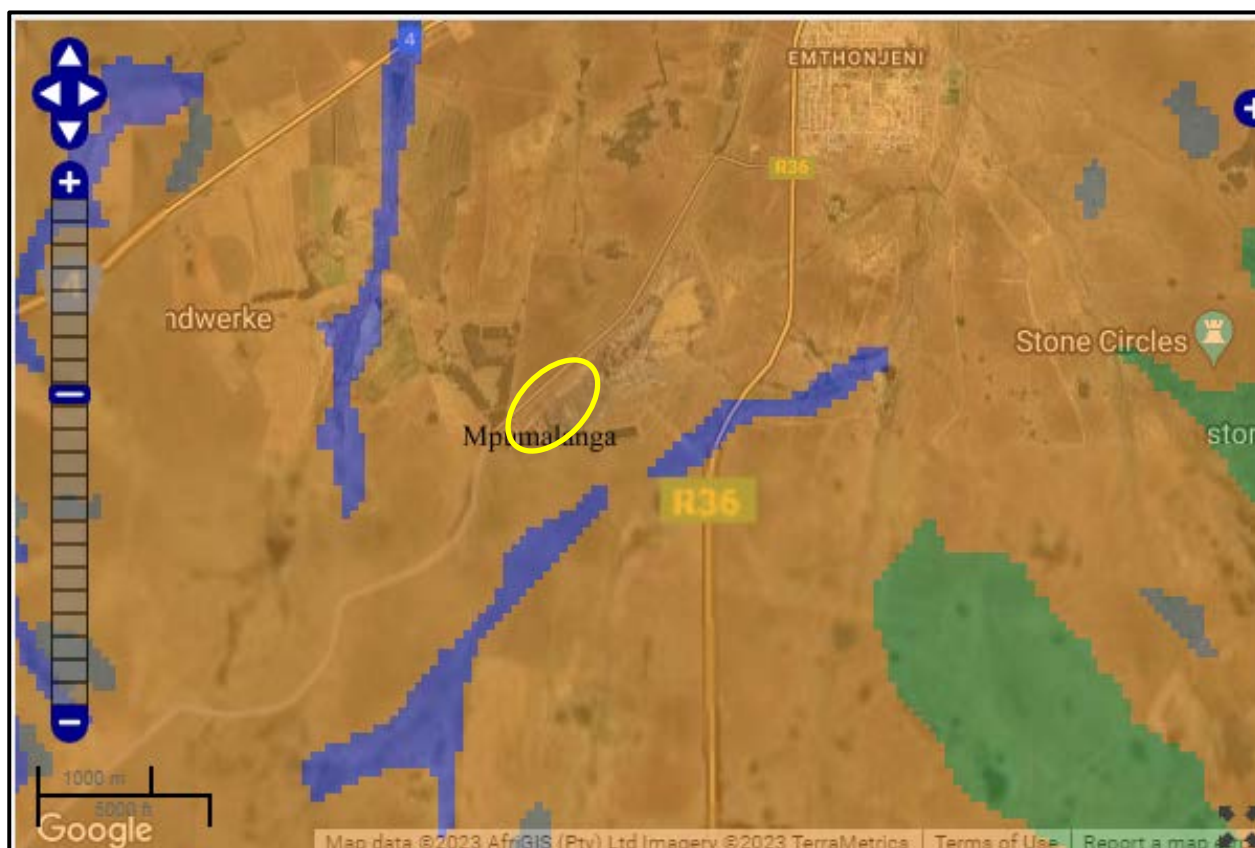


Figure 8.2.1988 Topographic map indicating roads in the study area as well as visible powerline infrastructure.

### 8.3 Paleontological Heritage

According to the SAHRA Paleontological map the study area is of high paleontological significance (Figure 8.3) and an independent study was commissioned for this aspect.



Colour	Sensitivity	Required Action
RED	VERY HIGH	Field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	Desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	Desktop study is required
BLUE	LOW	No palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	No palaeontological studies are required
WHITE/CLEAR	UNKNOWN	These areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map

Figure 8.3. Paleontological sensitivity of the approximate study area (yellow polygon) as indicated on the SAHRA Palaeontological sensitivity map.



## 9 Potential Impact

Impacts to heritage resources without mitigation within the project footprint will be permanent and negative and occur during the pre-construction and construction activities but is unlikely to manifest as no heritage features were noted in the study area. Any additional effects to subsurface heritage resources can be successfully mitigated by implementing a chance find procedure. With the implementation of the recommended mitigation measures impacts of the project on heritage resources is acceptable (Table 7).

Cumulative impacts are considered as an effect caused by the proposed action that results from the incremental impact of an action when added to other past, present, or reasonably foreseeable future actions. (Cornell Law School Information Institute, 2020). Cumulative impacts occur from the combination of effects of various impacts on heritage resources. The importance of identifying and assessing cumulative impacts is that the whole is greater than the sum of its parts. In the case of this project, impacts is seen as being low. However, this and other projects in the area can have a negative impact on heritage sites in the area where these sites have been destroyed unknowingly.

### 9.1.1 Pre-Construction phase

It is assumed that the pre-construction phase involves the removal of topsoil and vegetation as well as the establishment of infrastructure. These activities can have a negative and irreversible impact on heritage features if any occur. Impacts include destruction or partial destruction of non-renewable heritage resources but is unlikely to manifest.

### 9.1.2 Construction Phase

During this phase, the impacts and effects are similar in nature but more extensive than the pre-construction phase. Potential impacts include destruction or partial destruction of non-renewable heritage resources but is unlikely to manifest.

### 9.1.3 Operation Phase

No impacts are expected during the operation phase.

#### 9.1.4 Impact Assessment for the Project

Table 7. Impact assessment for the project.

<b>Nature:</b> During the construction phase activities resulting in disturbance of surfaces and/or sub-surfaces may destroy, damage, alter, or remove from its original position archaeological and paleontological material or objects.		
	<b>Without mitigation</b>	<b>With mitigation (Preservation/ excavation of site)</b>
<b>Extent</b>	Local (2)	Local (2)
<b>Duration</b>	Permanent (5)	Permanent (5)
<b>Magnitude</b>	Low (4)	Minor (2)
<b>Probability</b>	Improbable (2)	Improbable (2)
<b>Significance</b>	<b>22 (Low)</b>	<b>18 (Low)</b>
<b>Status (positive or negative)</b>	Negative	Negative
<b>Reversibility</b>	Not reversible	Not reversible
<b>Irreplaceable loss of resources?</b>	Yes	Yes
<b>Can impacts be mitigated?</b>	NA	NA
<b>Mitigation:</b>		
<ul style="list-style-type: none"> <li>Monitoring of the project area by the ECO during the construction phases for heritage chance finds, and if chance finds are encountered to implement the Chance Find Procedure for the project</li> </ul>		
<b>Cumulative impacts:</b>		
Other authorised projects (e.g., other renewable and infrastructure developments) in the area could have a cumulative impact on the heritage landscape. The impact on physical heritage is low as no sites of significance will be impacted on by the development.		
<b>Residual Impacts:</b>		
Although surface sites can be avoided or mitigated, there is a chance that completely buried sites would still be impacted on, but this cannot be quantified.		

## 10 Conclusion and recommendations

The area in which the project is located is extensively disturbed through the current Manganese Slag Dump that will be reworked and is considered to be of low heritage potential. The lack of significant heritage resources in the project footprint was confirmed during the site visit and no heritage features were recorded;

According to the SAHRA Paleontological sensitivity map the study area is of high paleontological significance (Figure 8.3) and an independent study was commissioned for this aspect. A Fossil Chance Find Protocol should be added to the EMPr.

The impact on heritage resources is considered to be low and the project can be authorised provided that the recommendations in this report are adhered to and based on the South African Heritage Resource Authority (SAHRA) 's approval.

### 10.1 Recommendations for condition of authorisation

The following recommendations for Environmental Authorisation apply and the project may only proceed based on approval from SAHRA:

#### **Recommendations:**

- Monitoring of the project area by the ECO during the construction phases for heritage chance finds, and if chance finds are encountered to implement the Chance Find Procedure for the project

## **10.2 Chance Find Procedures**

### **10.2.1 Heritage Resources**

The possibility of the occurrence of subsurface finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped, and a qualified archaeologist must be contacted for an assessment of the find and therefore chance find procedures should be put in place as part of the EMP. A short summary of chance find procedures is discussed below and monitoring guidelines for this procedure are provided in Section 10.5. This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

- If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.
- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.
- The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

### **10.2.2 Monitoring Program for Paleontology – to commence once the excavations / drilling activities begin.**

1. The following procedure is only required if fossils are seen on the surface and when drilling/excavations commence.
2. When excavations begin the rocks and must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (trace fossils, fossils of plants, insects, bone or coalified material) should be put aside in a suitably protected place. This way the project activities will not be interrupted.
3. Photographs of similar fossils must be provided to the developer to assist in recognizing the fossil plants, vertebrates, invertebrates or trace fossils in the shales and mudstones. This information will be built into the EMP's training and awareness plan and procedures.
4. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
5. If there is any possible fossil material found by the developer/environmental officer then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.
6. Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.
7. If no good fossil material is recovered, then no site inspections by the palaeontologist will be necessary. A final report by the palaeontologist must be sent to SAHRA once the project has been completed and only if there are fossils.
8. If no fossils are found and the excavations have finished then no further monitoring is required.

### **10.3 Reasoned Opinion**

The overall impact of the project is considered to be low and residual impacts can be managed to an acceptable level through implementation of the recommendations made in this report. The socio-economic benefits also outweigh the possible impacts of the development if the correct mitigation measures are implemented for the project.

### **10.4 Potential risk**

Potential risks to the proposed project are the occurrence of intangible features and unrecorded cultural resources (of which graves and subsurface cultural material are the highest risk). This can cause delays during construction, as well as additional costs involved in mitigation and possible layout changes.

### 10.5 Monitoring Requirements

Day to day monitoring can be conducted by the Environmental Control Officers (ECO). The ECO or other responsible persons should be trained along the following lines:

- *Induction training:* Responsible staff identified by the developer should attend a short course on heritage management and identification of heritage resources.
- *Site monitoring and watching brief:* As most heritage resources occur below surface, all earth-moving activities need to be routinely monitored in case of accidental discoveries. The greatest potential impacts are from pre-construction and construction activities. The ECO should monitor all such activities. If any heritage resources are found, the chance finds procedure must be followed as outlined above.

**Table 8.** Monitoring requirements for the project

Heritage Monitoring					
Aspect	Area	Responsible for monitoring and measuring	Frequency	Proactive or reactive measurement	Method
Cultural Heritage Resources chance find	Entire project area	EO & ECO	Weekly (Pre construction and construction phase)	Proactively	<ul style="list-style-type: none"> <li>• If risks are manifested (accidental discovery of heritage resources) the chance find procedure should be implemented:                             <ol style="list-style-type: none"> <li>1. Cease all works immediately;</li> <li>2. Report incident to Site Manager</li> <li>3. EPC (Engineering Procurement and Construction) Contractor to contact an archaeologist/ palaeontologist to inspect the site;</li> <li>4. Report incident to SAHRA; as advised by specialist and</li> <li>5. Employ site specific mitigation measures recommended by the specialist after assessment in accordance with the requirements of the relevant authorities.</li> </ol> </li> <li>• Only recommence operations once impacts have been mitigated.</li> </ul>

10.6 Management Measures for inclusion in the EMPr

Table 9. Heritage Management Plan for EMPr implementation

Area	Mitigation measures	Phase	Timeframe	Responsible party for implementation	Target	Performance indicators (Monitoring tool)
General project area	Monitoring of the project area by the ECO during the construction phases for heritage chance finds, and if chance finds are encountered to implement the Chance Find Procedure for the project.	Construction	Throughout the construction phase	Applicant EPC Contractor	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 35, 36 and 38 of NHRA	ECO Checklist/Report

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